

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TALIA N. HARRISON,

Plaintiff,

VS.

TYLER TECHNOLOGIES, INC.,

Defendant.

Civil Action No.: 4:21-cv-00607

DECLARATION OF CHARLES R. BRIDGERS

Pursuant to 28 U.S.C. §1746 Charles R. Bridgers hereby submits his declaration in further support of the Parties Joint Motion for Approval Settlement.

1. My name is Charles R Bridgers. I am over the age of twenty-one (21) and suffer from no legal disabilities. I make the following Declaration based on my personal knowledge as well as the contemporaneous business records of my firm.
2. I have been practicing law since my graduation, *cum laude*, from Georgia State College of Law in 1993. I am admitted in all state courts in Georgia, the United States District Court for the Southern, Middle and Northern Districts of Georgia, as well as the United States Court of Appeals for the Third, Sixth, and Eleventh Circuits. I have practiced employment law since

approximately 1996 primarily in the Atlanta metropolitan area but also throughout the state of Georgia and, on occasion, in other states. I have been a presenter at several CLE sessions including, most recently, in March of 2023 where I gave the “Wage and Hour Update 2023” at the Labor and Employment Law Institute of the Georgia State Bar. I also presented or participated in panels at that seminar in 2022 and 2019 on the same topic. I spoke on a similar topic at the National Employment Law Association of Georgia in 2022 and 2021. In September of 2016, I presented a paper on Certification and Decertification of § 216(b) Collective Actions under the Fair Labor Standards Act. My practice began to focus on the Fair Labor Standards Act in 2009. I have served as litigation counsel in over 700 cases throughout the United States (mostly in Georgia), approximately 380 of these matters were FLSA related. I hold an AV rating in the Martindale-Hubbe Law Directory and have been selected in the Super Lawyers program for the past three years.

3. During my career, I have represented employees in collective actions under the FLSA including 36 warehouse workers (*Jamaal Foster, et al. v. A-1 Quality Labor Services, LLC*, 1:11-CV-3342-JEC) firefighters (*Brandon Ervin, et al. v. City of East Point, Georgia*, 1:12-CV-04270-CAP); tradespeople (*Weakland, et.al. v. Unique Refinishers*, Civil Action No. 1:19-

cv-2581-MHC (10 Plaintiffs); and grocery store workers (*Revilla, et.al. v. Atlanta Imports Inc., et.al* (Civil Action No. 1:20-cv-03825-WMR)

4. During my approximately thirty years as an attorney, I have conducted approximately eighteen jury trials as well as a number of bench trials. In August 2013, for instance, a jury awarded our five clients contractually owed severance pay and attorneys' fees and costs of approximately \$500,000 in *Dr. Johnny Wilson, et al. v. Clark Atlanta University, Inc.*, Superior Court of Fulton County, Georgia, Civil File Action No. 2011-CV-196090. Other recent jury trials involving employment matters where I served as counsel include *Baker v. Baldwin Paving Company, Inc.*; 1:14-cv-03367-LMM (FLSA); *Nelson v. Jackson*; 1:14-cv-02851-ELR (ADA); *Sayyed v. Braids, Weaves & Things, Inc.*; 1:16-cv-01392-CAP (Title VII); and *Jackson v. P & K Restaurant Enterprise, LLC, et al*; 1:15-cv-00753-MHC (FLSA).
5. I currently serve as managing member of the law firm of DeLong, Caldwell, Bridgers, Fitzpatrick & Benjamin, LLC. (DCBFB)
6. Since approximately July of 2021, , along with the law firm of DCBFB, I have represented the Plaintiffs in this action. I shared primary responsibility for prosecuting this matter with Matthew W. Herrington.
7. Our firm has a practice of keeping contemporaneous time and expense records as part of our regular business activity. Individual slips (or records of activities and costs) are created by persons with knowledge of the activities

described. The information is tracked in Timeslips, our time and billing software. I assign certain tasks to other attorneys and to our staff members. As such, I am generally aware of these timekeepers' activities. As part of my typical routine, I review time and billing records on a regular basis. A true and correct copy of the firm's billing records for fees is attached hereto as Attachment A. A true and correct copy of the firm's billing records for costs is attached hereto as Attachment B (along with the receipts for expenses not documented in this Court's docket). These records are an accurate representation of the time, effort, and costs incurred in prosecuting this matter.

8. In total, DCBFB has incurred \$28,561.90 in attorney fees for this matter. (See Attachment A) Of this amount, DCBFB is seeking an award under the FLSA of \$26,553.50 and waiving any claim for an additional \$2,008.40 as explained later. ($\$26,553.50 + 2,008.40 = \$28,561.90$) The Court should note that the amount sought includes and additional 3.5 hours that we anticipate will be needed to file a reply brief and to finalize the settlement.
9. In addition, DCBFB is seeking an award under the FLSA of \$1,271.00 in expenses (See Attachment B) in prosecuting this action, for a total of \$27,824.50 in fees and expenses.
10. Neither the fees or the expenses DCBFB seeks includes time incurred by Attorney Melinda Arbuckle. Ms. Arbuckle will present her own Declaration.

11. The following persons recorded billed time in this matter (per Attachment C):

Time Keeper	Position	Billable Rate	Total Amount Sought in Fee Petition
Charles R. Bridgers	Partner	\$435	\$6,625.77
Matthew W. Herrington	Senior Associate / Of Counsel	\$390	\$19,737.90
Jessica Sorrenti	Senior Paralegal	\$170	\$189.83
Sarah Toenes	Paralegal	\$125	0
		Total	\$26,553.50

12. Based on my extensive experience in litigating civil rights and labor and employment claims including the FLSA, I am familiar with the hourly rates charged by other civil rights and labor and employment attorneys (and their staffs), including attorneys who represent primarily plaintiffs and attorneys who represent primarily employers.
13. Consistent with the “lodestar” framework for analyzing attorney’s fees claims mandated in *Hensley v. Eckerhart*, 461 U.S. 424, 103 S.Ct 1933, 76 L.Ed.2d 40 (1983), as interpreted in *Norman v. Housing Authority of the City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988) and *Perkins v. Mobile Housing Bd.*, 847 F.2d 735 (11th Cir. 1988), the following information is intended to establish the reasonableness of the number of hours expended in

this case, as well as the reasonableness of my hourly rate in light of the prevailing market conditions in the Atlanta, Georgia geographical area.

14. My hourly rate of \$435 per hour is reasonable and in line with the rates charged by other attorneys in the Atlanta area who possess similar skill, experience and training. I now charge most of my new clients \$435 per hour whether paid hourly or on a contingency fee basis and have done so since January of 2022. This rate was specifically approved in *Hoffman, et.al. v. Jabnat, LLC*, 1:21-cv-03147-LMM, Dkt. 27-2 (The "Court concludes . . . The attorneys' fees including the rates charged by counsel are reasonable and customary." (2022 rates set out in Dkt. 26-4 for Bridgers (\$435) and Senior Paralegal Jessica Sorrenti (\$170), and Paralegal Sarah Toenes (\$125)); *Bethel v. Lazer Spot, Inc.*, 1:20-cv-18350AT, Dkt. 78, p.1 (Implicitly approving rates set out in Dkt. 76, p. 4 for Bridgers (\$435); Senior Association Herrington (\$390); Senior Paralegal Sorrenti (\$170); Paralegal Toenes (\$125); *Simmons, et.al. v. Futo's Inc.*, 1:21-cv-03591-TWT, Dkt. 38, p. 2 ("The attorneys fees including the rates charged by counsel are reasonable and customary.") The fees sought in Dkt. 378-6, p10, were \$435 for Bridgers; and \$170 for Senior Paralegal Sorrenti. *Crowe, et.al. v. AMD Welding Services, et.al*, 2:22-cv-057-SCJ, Dkt. 18, p.2 ("The Court also finds the hourly rates of counsel and their staff as stated in the Joint Motion are reasonable and customary.") The fees sought in Dkt. 17, p.12 were \$435 for

Bridgers; and \$170 for Sorrenti; *Shands v. Atlanta Imports, Inc.*, 1:22-cv-00044-WMR (Dkt. 19, p. 2) ("Plaintiff's counsel Charles R. Bridgers has requested a rate of \$435 per hour, Mitchell D. Benjamin has requested a rate of \$435 per hour The Court finds that the hourly rates requested are reasonable, as well as the attorney's fees and costs specified in the Settlement Agreement (Dkt. 18-1)."); *Chancy v. Loving Hearts Caregivers, LLC*, et.al., 1:22-cv-1363-SEG, Dkt. 14, p.2) ("The attorney's fees including the rates charged by counsel are reasonable.") The fees sought in Dkt. 13-3 were \$435 for Bridgers: \$170 for Senior Paralegal Sorrenti; *Pate, et.al. v. Chalil Brothers Investments LLC, et.al.*, 1:22-cv-01454-ELR, Dkt. 16-5 (" . . . the Courts finds that sum [the attorneys fees requested] to be appropriate here, given that . . . other judges of this district have recently approved of the rates charged by Plaintiff's counsel." The rates sought in *Pate* were \$435 for Bridgers, \$390 for Herrington, \$165 for Sorrenti, and \$125 for Toenes. *Id.*, Dkt. 15-3.

15. Matthew Herrington, originally a senior associate and now *Of Counsel* to DCBFB had primary responsibility in this matter. Mr. Herrington has been practicing law since his graduation, *cum laude*, from the University of Georgia School of Law in 2013. He is admitted in all state courts in Georgia, the United States District Court for the Northern, Middle, and Southern Districts of Georgia, as well as the United States Court of Appeals for the

Eleventh Circuit. He has practiced employment law—primarily Fair Labor Standards Act litigation— since approximately October 2013, primarily in the Atlanta metropolitan area but also throughout the state of Georgia. He has been an invited presenter at a CLE session organized by the Georgia chapter of the National Employment Lawyers Association. Mr. Herrington has served as counsel in well over 100 FLSA cases, including several collective actions. He has acted as lead counsel on two jury trials and one bench trial. For instance, in *Casey et al. v. 1400 Northside Drive, Inc.*, (Civil Action No. 1:16-cv-4517-SCJ (N.D. Ga.), a jury awarded our five clients overtime wages, liquidated damages and attorneys’ fees and costs of approximately \$814,000 in May of 2018); Additionally, Mr. Herrington has presented oral argument before the Eleventh Circuit Court of Appeals on two occasions in FLSA matters. Mr. Herrington’s rate of \$390 is reasonable in the Atlanta market and has been approved by numerous courts across the State of Georgia. See *Bethel v. Lazer Spot, Inc.*, and *Pate v. Challil*, *supra*. The year prior, Mr. Herrington’s prior rate of \$375 had been specifically approved in *Stephens v. RV Behavioral*, 1:21-cv-01056-LMM-JLK, Dkt. 38-2 ("The Court finds that the hourly rates of counsel and their staff as stated in the Joint Motion are reasonable and customary.") Those rates were set out in Dkt. 36, p. 8 for partners (\$435); Senior Associate Herrington (\$375); Senior Paralegal Jessica Sorrenti (\$170); and Paralegals Toenes (\$125).

16. In representing the Plaintiff, we utilized the services of Ms. Jessica Sorrenti, senior paralegal. I am familiar with her backgrounds and skills. Ms. Sorrenti has worked as a paralegal for approximately 25 years and with our firm for almost 15 years. She is fluent in Spanish and English. As the primary responsible attorney in our firm for this case, I have directed and supervised her efforts in this matter. Ms. Sorrenti's rate of \$170. See the summary of rates set out above.
17. Ms. Sarah Toenes, paralegal, also assisted in our representation. Ms. Toenes only had a small amount of time in this matter and Plaintiff is not seeking any of it in this fee petition.
18. I organized time billed (not expenses) into broad categories that reflect the phase of the litigation for both management, client budget, and fee application purposes. I have prepared a summary of those categories using the records of our firm. See Attachment D. I have also prepared a more detailed Attachment E which provides the full information by slip for each category. (The substance of Attachment D and E's billing records is the same as Attachment A except Attachments D and E are organized by category with either less detail (Attachment D) or more detail (Attachment E). The categorization is accurate for providing an overview of the effort incurred during each phase of the litigation given the limitation that it is sometimes difficult to categorize an individual entry with 100 percent certainty.

19. In further explanation of Attachments D and E, the following chart provides a description of the phases of litigation and how they are categorized along with a total amount of fees incurred per category (not expenses) incurred. Attachment D also has the total broken down by hours worked and percentage of hours worked.

Phase of Litigation	Description	Amount Billed Per Phase and Percentage of Total Fees Sought
01-Intake	Initial meetings with clients; initial development of factual narrative, advice about the process of litigation, decision to proceed, extensive pre-litigation settlement negotiations, and explanation of DCBFB Client instructions and Retainer Agreement	\$738.25 2.78%
02-Complaint_ COIP_Service	Initial factual investigation; draft and revisions of Complaint; client review of Complaint; Certificate of Interested Persons	\$819.00 3.08%
03-Answer_Disclosures_JPR	Review of Answer(s) filed; drafting, reviewing and finalizing Disclosures and Joint Preliminary Report	\$745.95 2.81%

04-AmendCompl-Ans	Draft and revisions of Amended Complaint and Effort regarding Amended Answer	\$234.00 .88%
06-Damage Estimate	Damage Estimate: Efforts reviewing time and pay records to prepare an estimate of Plaintiff's damages	\$1,631.25 6.14%
07-Written Discovery	Efforts in preparing and responding to written discovery	\$2,699.46 10.17%
10-Conferral-Discovery	Efforts seeking documents in the conferral process	\$43.50 .16%
12-Depositions	Scheduling, noticing, preparing for and conducting depositions of a Rule 30(b)(6) representative and both individual defendant	\$4,343.00 16.36%
13-Motions	Drafting and Responding to Motions including motion to extend time to answer and motion to approve settlement.	\$5,981.55 22.53%
15- Motion for Summary Judgement	Motion for Summary Judgment and Related Factual Development	\$1,930.35 7.27%
16-Settlement	Efforts to resolve matter including negotiation and attempts to resolve attorney fee issues	\$4,081.50 15.37%
19- Trial and Trial Preparation	Trial Related Preparation and Conduct (other than PTO)	\$195.00 .73%

23-Mediation	All Efforts re: preparation for and conduct of mediation	\$1,561.53 5.88%
27-Legal Research Other	Conduct legal research not otherwise categorized	\$237.90 .90%
29-Miscellaneous Case Efforts	Miscellaneous Duties Related to Case, review of incoming correspondence, incoming orders, extensions, staff assignments	\$791.40 2.98%
30-Factual Development	Interviewing witnesses and reviewing facts not otherwise categorized	\$286.13 1.08%
32-Offer of Judgment Activity	Efforts relating to offer of judgment per FRCP 68	\$233.33 .88%
	Total	\$26,553.50

20. In preparation for this Motion and in exercise of our “billing judgment”, I reviewed the fees and costs. I marked several entries or portions of entries as “no charge” in order to present a conservative calculation of fees. This reduction is done out of an abundance of caution not as an admission that the work was not done or not necessary for the successful conclusion of this matter. I also deleted a few entries entirely that I could not confirm were related to this matter. In total, I have reduced the fees sought by \$2,008.40.

21. Based on my experience and training, I possess the requisite skills and knowledge to adequately represent my client and to offer my professional opinion concerning the reasonableness of the number of hours expended in this case and the reasonableness of the hourly rates sought to be recovered.
22. The expenses and the effort incurred were reasonable to prosecute this matter and to obtain an excellent result for the Plaintiff. Although several persons worked on this matter, as demonstrated in attachments to this declaration, none of the hours expended by counsel or staff has been “excessive,” “redundant” or “unnecessary.” To the contrary, at every opportunity, Plaintiff’s attorneys attempted to economize and to minimize expenses. As the Court will note, our staff members bill at different rates depending on their experience level. We attempt to assign tasks to the appropriate person to reduce the overall bill.
23. In light of the factors specified in *Johnson v. Georgia Highway Express*, 488 F.2d 714 (5th Cir 1974), the total fees and costs as set out above is eminently reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 21st day of March 2023.

s/ Charles R. Bridgers
Charles R. Bridgers
Georgia Bar No. 080791

ATTACHMENT A

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Selection Criteria					
Clie.Selection Slip.Slip Type	Include: Harrison, Talia Time				
Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value	
7/27/2021 Billable Harrison, Talia: call wtih client re: documents; review client documents	TIME	M. Herrington Intake	1.20 / \$390.00	\$468.00	
7/29/2021 Billable Harrison, Talia: call with client re: factual issues for complaint; review Wright complaint and edit for Harrison; discuss venue issues with CRB; research venue issue	TIME	M. Herrington Compl_COIP_	1.70 / \$390.00	\$663.00	
7/29/2021 Billable Harrison, Talia: communication with Texas counsel re local counsel agreement; review local rules in EDTX	TIME	M. Herrington Compl_COIP_	0.40 / \$390.00	\$156.00	
7/29/2021 Billable Harrison_Talea: Work with Herrington on claims, local counsel issues, venue strategy; Research venue and jurisdictional issues, review earlier filings in Wright case.	TIME	C.R. Bridgers Misc	1.34 / \$435.00	\$582.90	
7/29/2021 No Charge Harrison_Talea: Review and revise local counsel agreement. Forward to Arbuckle.	TIME	C.R. Bridgers Misc	0.89 / \$435.00	\$387.15	
8/1/2021 No Charge Revise agreement with co-counsel.	TIME	C.R. Bridgers Intake	1.20 / \$435.00	\$522.00	
8/3/2021 Billable Follow up with Melinda Arbuckle re complaint. Finalize Same.	TIME	C.R. Bridgers Intake	0.34 / \$435.00	\$149.35	

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
8/3/2021 Billable Finalize Pro-Hac Filing.	TIME	C.R. Bridgers Misc	0.10 / \$435.00	\$43.50
8/3/2021 No Charge Finalize Pro Hac Vice applications for MWH & CRB; electronically file Pro Hac Vice for CRB	TIME	S. Toenes Motions	0.40 / \$125.00	\$50.00
8/3/2021 Billable Pass initial research on consents to Arbuckle.	TIME	M. Herrington Intake	0.31 / \$390.00	\$120.90
8/4/2021 Billable Review incoming docket notice on pro-hac and potential to refer to magistrate.	TIME	C.R. Bridgers Misc	0.10 / \$435.00	\$43.50
8/4/2021 No Charge Emails with MWH; electronically file Pro Hac Vice for MWH	TIME	S. Toenes Motions	0.25 / \$125.00	\$31.25
8/5/2021 No Charge Finalize pro hac application,	TIME	M. Herrington Misc	0.10 / \$390.00	\$39.00
8/27/2021 Billable Review answer and corporate disclosure statement; inform client re: content of answer	TIME	M. Herrington Ans_DiscI_JP	0.20 / \$390.00	\$78.00
8/27/2021 Billable Research on necessity of pleading affirmative defenses and standard for more definite statement motion; correspondence with local counsel re: same	TIME	M. Herrington Research-Leg	0.61 / \$390.00	\$237.90
9/15/2021 Billable 26(f) conference; debrief with local counsel re: repleading and settlement issues	TIME	M. Herrington Ans_DiscI_JP	0.90 / \$390.00	\$351.00
9/20/2021 No Charge	TIME	M. Herrington AmendedPlea	2.20 / \$390.00	\$858.00

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
Call with client re: [redacted] ; correspondence with local counsel re: same; begin drafting amended pleadings; review california pleadings				
9/21/2021 Billable Call with LC re: collective; call with client re: [redacted] determine not to pursue collective	TIME	M. Herrington AmendedPlea	0.60 / \$390.00	\$234.00
9/29/2021 No Charge Discussion with MH; Call to Court Reporter in previous case re: transcript; Email to Court Reporter	TIME	J. Sorrenti Discovery_Wr	0.20 / \$170.00	\$34.00
9/29/2021 Billable Review initial filings.		C.R. Bridgers Misc	0.10 / \$435.00	\$43.50
9/30/2021 Billable Emails to and from Court Reporter re: transcript in previous action to avoid retaking evidence; Emails to and from CRB/MH re: fee; Prepared mailing	TIME	J. Sorrenti Discovery_Wr	0.25 / \$170.00	\$42.50
10/18/2021 Billable Drafting initial disclosures; discuss with local counsel	TIME	M. Herrington Ans_DiscI_JP	0.40 / \$390.00	\$156.00
10/19/2021 Billable Review incoming documents and respond to Reed Smith paralegal for transmission with wrong email address.	TIME	C.R. Bridgers Ans_DiscI_JP	0.37 / \$435.00	\$160.95
11/17/2021 Billable Review time and pay documents; compile damages calculation; call with client re: same; draft demand.	TIME	M. Herrington DamageEst	2.40 / \$390.00	\$936.00
11/17/2021 Billable Review damage estimate with Herrington.	TIME	C.R. Bridgers DamageEst	0.81 / \$435.00	\$352.35
1/4/2022 Billable review mediation particulars.	TIME	C.R. Bridgers Mediation	0.10 / \$435.00	\$43.50

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
1/4/2022 Billable Discuss mediation strategy and plans with Herrington.	TIME	C.R. Bridgers Mediation	0.10 / \$435.00	\$43.50
1/4/2022 Billable Settlemet correspondence with OC; call with client re: same	TIME	M. Herrington Mediation	0.40 / \$390.00	\$156.00
1/4/2022 Billable Call with CRB; discuss subpoenas to Constangy and Reed Smith, deposition of McKeeby	TIME	M. Herrington Discovery_Wr	0.20 / \$390.00	\$78.00
1/5/2022 No Charge Review schedulign and comments to Herrington.	TIME	C.R. Bridgers Mediation	0.10 / \$435.00	\$43.50
1/6/2022 Billable Mediation preparation with client; call wtih CRB re: settlement progress;attend mediation	TIME	M. Herrington Mediation	2.90 / \$390.00	\$1,131.00
1/6/2022 Billable Calls from Matthew with status and discussion/approval of negotiation moves.	TIME	C.R. Bridgers Mediation	0.33 / \$435.00	\$144.03
1/10/2022 Billable Discuss mediator's proposal with Herrington.	TIME	C.R. Bridgers Mediation	0.10 / \$435.00	\$43.50
1/12/2022 Billable Review incoming OOJ; Send back questions to Herrington on damages and status as well as client notification.	TIME	C.R. Bridgers OfferJudgeme	0.18 / \$435.00	\$77.33
1/14/2022 Billable Discussion with MWH; process evidence documents for transmission; Email to MH	TIME	J. Sorrenti Discovery_Wr	0.17 / \$170.00	\$28.33

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
1/18/2022 Billable Review client documents; deposition preparation meeting with client	TIME	M. Herrington Depositions	2.20 / \$390.00	\$858.00
1/19/2022 Billable Conference with Herrington on deposition strategy for client	TIME	C.R. Bridgers Depositions	0.54 / \$435.00	\$234.90
1/19/2022 Billable Deposition of client; calls with CRB re: deposition issues; meetings with client	TIME	M. Herrington Depositions	8.00 / \$390.00	\$3,120.00
1/20/2022 Billable Email from OC re: document production; review new client documents; communication with client re: same	TIME	M. Herrington Discovery_Wr	1.30 / \$390.00	\$507.00
2/2/2022 Billable Discuss depositions and MSJ deadline conflict with Herrington; Suggest plan. Respond to Matthew with email question re time limit of deposition and how to handle defendant passing 7 hours.	TIME	C.R. Bridgers Depositions	0.20 / \$435.00	\$87.00
2/24/2022 Billable Discuss protective order with co-Counsel.	TIME	M. Herrington Discovery_Wr	0.28 / \$390.00	\$109.20
3/3/2022 Billable Call with Matthew re strategy for response and review emails re same.	TIME	C.R. Bridgers MSJ	0.21 / \$435.00	\$91.35
4/12/2022 Billable Discuss discovery issues with Herrington.	TIME	C.R. Bridgers Discovery_Wr	0.16 / \$435.00	\$69.60
4/25/2022 Billable Emails to and from CRB; Process and review Defendant's additional document production and saved to file	TIME	J. Sorrenti Discovery_Wr	0.10 / \$170.00	\$17.00

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
4/28/2022 Billable Review emails from Herrington to lcoal counsel re motion to compel.	TIME	C.R. Bridgers Conferral_Disc	0.10 / \$435.00	\$43.50
5/22/2022 Billable Review emails on MSJ status and plans. .	TIME	C.R. Bridgers MSJ	0.10 / \$435.00	\$43.50
5/27/2022 Billable Conference with Herrington on outgoing discovery on emails.	TIME	C.R. Bridgers Discovery_Wr	0.45 / \$435.00	\$195.75
6/1/2022 Billable Discuss status of email request / MSJ.	TIME	C.R. Bridgers Discovery_Wr	0.11 / \$435.00	\$48.58
6/13/2022 No Charge Review emails re new assignments to paralegalas.	TIME	C.R. Bridgers Misc	0.10 / \$435.00	\$43.50
6/13/2022 Billable Discuss division of labor and assignmetns with Melinda Arbuckle for witness calls.	TIME	C.R. Bridgers Factual Devel	0.31 / \$435.00	\$134.85
6/15/2022 Billable Confirm assignments of tasks to paralegal in Harrison matter.	TIME	C.R. Bridgers Factual Devel	0.35 / \$435.00	\$151.28
6/21/2022 Billable Respond to Herrington re Jerra tickets and discovery requests.	TIME	C.R. Bridgers Discovery_Wr	0.10 / \$435.00	\$43.50
7/22/2022 Billable Emails with MA re case direction.	TIME	M. Herrington Misc	0.10 / \$390.00	\$39.00

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
8/25/2022 Billable Review new production (JIRA); communications with client re: same	TIME	M. Herrington Discovery_Wr	2.70 / \$390.00	\$1,053.00
8/29/2022 Billable Continue review of documents provided (JIRA); calls with client re: same	TIME	M. Herrington Discovery_Wr	1.30 / \$390.00	\$507.00
9/21/2022 Billable correspondence with OC; legal research; correspondence with co-counsel	TIME	M. Herrington MSJ	0.30 / \$390.00	\$117.00
9/22/2022 Billable Multiple calls with Matthew and Melinda re response / surreply to objections and motions.	TIME	C.R. Bridgers MSJ	0.45 / \$435.00	\$195.75
9/22/2022 Billable Review MSJ; correspondence with OC; legal research; correspondence with Co-counsel	TIME	M. Herrington MSJ	2.50 / \$390.00	\$975.00
9/27/2022 Billable discuss status of case and settlement. with CRB	TIME	M. Herrington Misc	0.10 / \$390.00	\$39.00
10/6/2022 Billable Discuss status of motion with Herrington.	TIME	C.R. Bridgers MSJ	0.10 / \$435.00	\$43.50
11/2/2022 Billable Review MSJ order. Call to Matthew.	TIME	C.R. Bridgers MSJ	0.35 / \$435.00	\$152.25
11/2/2022 Billable Review MSJ order; call with client to discuss; follow up with CRB and MA	TIME	M. Herrington MSJ	0.80 / \$390.00	\$312.00

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
11/3/2022 Billable Review deposition for damages issues; all with client re: damages; damages calculations	TIME	M. Herrington DamageEst	0.50 / \$390.00	\$195.00
11/4/2022 Billable Call with MA and CRB; discuss potential trial issues (travel for witnesses, trial depositions, cost shifting); settlement issues discussed	TIME	M. Herrington Trial	0.50 / \$390.00	\$195.00
11/7/2022 Billable Set up call with Matthew re settlement.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
11/14/2022 Billable Update with Matthew on response to request for settlement; Call with opposing counsel.	TIME	C.R. Bridgers Settlement	0.41 / \$435.00	\$178.35
11/17/2022 Billable Discuss fee demand with CRB	TIME	M. Herrington Settlement	0.10 / \$390.00	\$39.00
12/1/2022 Billable Call with OC to discuss settlement and trial issues	TIME	M. Herrington Settlement	0.20 / \$390.00	\$78.00
12/1/2022 Billable Review billing for demand letter; draft demand; discuss with CRB; communication with MA re: her time and fee records	TIME	M. Herrington Settlement	1.20 / \$390.00	\$468.00
12/1/2022 Billable Discuss expense issue with MWH and task Maria Arul with review. More conversations re settlement demand.	TIME	C.R. Bridgers Settlement	0.43 / \$435.00	\$187.05
12/2/2022 Billable Finalize settlement demand, incorporate MA fees; review correspondence with Maria and CRB re: costs	TIME	M. Herrington Settlement	0.20 / \$390.00	\$78.00

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DeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
Slip Listing - By Date 3-2023

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
12/2/2022 Billable Work with Maria on expenses and damage estimate.	TIME	C.R. Bridgers DamageEst	0.34 / \$435.00	\$147.90
12/13/2022 Billable Review emails from MWH with client on depositions and notes to file.	TIME	C.R. Bridgers Depositions	0.10 / \$435.00	\$43.50
12/13/2022 Billable Call with client re: settlement; review OOJ; review billing	TIME	M. Herrington OfferJudgeme	0.40 / \$390.00	\$156.00
12/14/2022 Billable Prepare for and call with client re settlement.	TIME	C.R. Bridgers Settlement	0.61 / \$435.00	\$265.35
12/14/2022 Billable Call with client; draft counteroffers	TIME	M. Herrington Settlement	1.00 / \$390.00	\$390.00
12/24/2022 Billable Draft email to client re authority to make counter proposal.	TIME	C.R. Bridgers Settlement	0.41 / \$435.00	\$178.35
12/24/2022 Billable Review emails re settlement progress from herrington. Notes to file.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
12/27/2022 Billable Draft counteroffer	TIME	M. Herrington Settlement	0.91 / \$390.00	\$354.90
12/30/2022 Billable Correspondence with OC.	TIME	M. Herrington Settlement	0.10 / \$390.00	\$39.00

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DeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
Slip Listing - By Date 3-2023

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
12/30/2022 Billable Review incomring offer from McKeebee, review context and make recommendation to client.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
1/6/2023 Billable Review and respond to emails from MWH re settlement agreemeent and prevailing party standard.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
1/9/2023 Billable T.call with M Arbuckle re settlement issues.	TIME	M. Herrington Settlement	0.10 / \$390.00	\$39.00
1/23/2023 Billable Review settlement agreement issues with MWH and Arbuckle.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
1/23/2023 Billable Review settlement agreement; edit same; email correspondence with OC; review previous settlement correspondence for discussion of confidentiality and scope of releases	TIME	M. Herrington Settlement	0.70 / \$390.00	\$273.00
1/24/2023 Billable Review settlement motion draft; edit same; review Greene approval motion	TIME	M. Herrington Settlement	0.70 / \$390.00	\$273.00
1/27/2023 Billable Email and call with OC re: confidentiality; call with CRB re: same	TIME	M. Herrington Settlement	0.40 / \$390.00	\$156.00
1/31/2023 Billable Review proposed settlemetn agreement and resopnd to Herrington.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
2/2/2023 Billable settlement correspondence with OC	TIME	M. Herrington Settlement	0.20 / \$390.00	\$78.00

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Slip Listing - By Date 3-2023

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
2/3/2023 Billable review settlement correspondence; further settlement communications re: terms for settlement agreement	TIME	M. Herrington Settlement	0.30 / \$390.00	\$117.00
2/4/2023 Billable Respond to Matthew after reading Paulo's last email on terms.	TIME	C.R. Bridgers Settlement	0.10 / \$435.00	\$43.50
2/13/2023 Billable arrange motion to extend	TIME	M. Herrington Motions	0.10 / \$390.00	\$39.00
2/13/2023 Billable settlement correspondence w/ OC	TIME	M. Herrington Settlement	0.20 / \$390.00	\$78.00
2/14/2023 Billable correspondence with OC re: settlement agreement language	TIME	M. Herrington Settlement	0.20 / \$390.00	\$78.00
2/15/2023 Billable review final edits to agreement; respond to OC	TIME	M. Herrington Settlement	0.20 / \$390.00	\$78.00
2/16/2023 Billable communication with OC re: final draft	TIME	M. Herrington Settlement	0.10 / \$390.00	\$39.00
2/16/2023 Billable revise settlement motion draft; email OC	TIME	M. Herrington Settlement	0.10 / \$390.00	\$39.00
2/24/2023 Billable finalize revisions of settlement motion; email OC	TIME	M. Herrington Settlement	0.60 / \$390.00	\$234.00

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DeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
Slip Listing - By Date 3-2023

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
3/6/2023 Billable Review email from OC	TIME	M. Herrington Settlement	0.10 / \$390.00	\$39.00
3/14/2023 Billable being drafting fee petition; review billing	TIME	M. Herrington Motions	0.40 / \$390.00	\$156.00
3/15/2023 Billable drafting fee petition; review billing related research; review previous texas fee petitions; email with OC; discussion with CRB and co-counsel re: extension due to CRB out of town	TIME	M. Herrington Motions	2.20 / \$390.00	\$858.00
3/15/2023 Billable review motion for extension re: settlement motion; email OC	TIME	M. Herrington Motions	0.10 / \$390.00	\$39.00
3/16/2023 Billable Drafted Motion to Extend Time for fee petition and proposed Order; Emails to and from MH; Revised Motion	TIME	J. Sorrenti Motions	0.60 / \$170.00	\$102.00
3/20/2023 Billable Review billing records for fee petition to exercise billing judgment and finalize.	TIME	C.R. Bridgers Motions	1.23 / \$435.00	\$535.05
3/21/2023 Billable Finalizing fee petition; discussion with CRB; related research (time estimated through end of day to permit finalization of billing records)	TIME	M. Herrington Motions	3.50 / \$390.00	\$1,365.00
3/21/2023 Billable Review and finalize Arbuckle declaration; Declaration of CR Bridgers; Generate reports for same. (time estimated through end of day to permit finalization of billing records)	TIME	C.R. Bridgers Motions	3.50 / \$435.00	\$1,522.50
3/21/2023 Billable Reply Brief: Conservative Estimate of time required for reply brief. THIS AMOUNT ESTIMATED BEFORE INCURRED.	TIME	M. Herrington Motions	3.50 / \$390.00	\$1,365.00

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DeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
Slip Listing - By Date 3-2023

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Date Status Description	Billable Slip Value	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Slip Value
<hr/>				
<hr/>				
Grand Total			\$26,553.50 \$2,008.40	\$28,561.90
<hr/>				
<hr/>				

ATTACHMENT B

3/21/2023
4:29 PMDeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
--DCBFB Fee Split - Expenses by TK v2

Page 1

Selection Criteria

Slip Slip Type	Expense
Clie Selection	Include: Harrison, Talia

ID	Date	Type	Description	Slip Value
<u>Timekeeper: W & H Project</u>				
151066	8/4/2021	EXP	Pro Hac for CRB	\$100.00
151067	8/4/2021	EXP	Pro Hac fee for MWH	\$100.00
156859	2/4/2022	EXP	Copy of the deposition of Talia Harrison- Volume	\$574.00
156860	6/16/2022	EXP	Filing fee with Subpoena expense	\$497.00
Total: W & H Project				\$1,271.00
Grand Total				\$1,271.00

Shellist Lazarz Slobin, LLP

11 Greenway Plaza
Suite 1515
Houston, Texas 77046

Invoice

Date	Invoice #
6/16/2022	5853

Bill To
Delong Caldwell Bridger Fitzpatrick Benjamin, LLC 101 Marietta Street, Suite 2650 Atlanta, GA 30303

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	Expenses in Talia Harrison v. Tyler Technologies, Inc.		
	Name search 1 Service	1.00	1.00
	Filing fee 1 Filing fee	402.00	402.00
	Subpoena 1 Service	94.00	94.00
	Total Reimbursable Expenses		497.00
	Isabella, Retainer under Harrison		
	B. Please		
	✓ pay any amount fees		
	to Shellist and show		
	Payment in Time share		
	so we can be reimbursed		
Thank you!		Total	\$497.00
		Payments/Credits	\$0.00
		Balance Due	\$497.00

✓ 06/25/22
ck #1579

Invoice for Court Reporting Services

Osteen & Associates
 Reporting Services, Inc.
 313 Northglen Dr.
 Hurst, TX 76054

Date	Invoice #
2/4/2022	15084

Terms
Due on receipt

Mr. Matthew W. Herrington
 DeLong Caldwell Bridgers
 Fitzpatrick Benjamin
 101 Marietta St. NW, Ste. 2650
 Atlanta, Georgia 30303

Description of Services/Items Provided	Amount
COPY OF THE DEPOSITION of: TALIA N. HARRISON (250 pgs of transcript. N/C exhibits) Date of proceedings: 1/19/2022 Reporter: Leah K. Osteen, CSR	500.00
COPY OF THE DEPOSITION of: TALIA N. HARRISON (Vol. 2) (37 pgs of transcript) Date of proceedings: 2/2/2022 Reporter: Leah K. Osteen, CSR	74.00
TALIA N. HARRISON vs. TYLER TECHNOLOGIES, INC.	

Make CHECKS PAYABLE TO
Osteen & Associates
Reporting Services, Inc.
EIN 46-1914553

E-mail
 leahosteen@charter.net

Total \$574.00

ATTACHMENT C

3/21/2023
4:45 PMDeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
--DCBFB Fee Split and Fee App Time Summary Listing-By Timekeeper

Page 1

Selection Criteria

Slip.Slip Type	Time
Clie.Selection	Include: Harrison, Talia

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
C.R. Bridgers	Billable	15.23		6625.77	6625.77
	Unbillable	2.29		996.15	
	Total	17.52		7621.92	
J. Sorrenti	Billable	1.12		189.83	189.83
	Unbillable	0.20		34.00	
	Total	1.32		223.83	
M. Herrington	Billable	50.61		19737.90	19737.90
	Unbillable	2.30		897.00	
	Total	52.91		20634.90	
S. Toenes	Billable	0.00		0.00	0.00
	Unbillable	0.65		81.25	
	Total	0.65		81.25	
Grand Total	Billable	66.96		26553.50	26553.50
	Unbillable	5.44		2008.40	
	Total	72.40		28561.90	

ATTACHMENT D

3/21/2023
5:07 PMDeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
--DCBFB Slip Summary by Activity-Summary Only-No Detail

Page 1

Selection Criteria

Slip.Billing Status Billable
Slip.Slip Type Time
Clie.Selection Include: Harrison, Talia

Title	Amount	% Total	Time	% Total
01-Intake				
Fees: Slip Value	738.25	2.78%	1.85	2.76%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	738.25	2.78%	1.85	2.76%
02-Complaint_COIP_Service				
Fees: Slip Value	819.00	3.08%	2.10	3.14%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	819.00	3.08%	2.10	3.14%
03-Answer_Disclosures_JPR				
Fees: Slip Value	745.95	2.81%	1.87	2.79%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	745.95	2.81%	1.87	2.79%
04-Amended Complaint/Answer				
Fees: Slip Value	234.00	0.88%	0.60	0.90%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	234.00	0.88%	0.60	0.90%
06-Damage Estimate				
Fees: Slip Value	1631.25	6.14%	4.05	6.05%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1631.25	6.14%	4.05	6.05%
07-Written Discovery				
Fees: Slip Value	2699.46	10.17%	7.12	10.63%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	2699.46	10.17%	7.12	10.63%
10-Conferral on Discovery				
Fees: Slip Value	43.50	0.16%	0.10	0.15%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	43.50	0.16%	0.10	0.15%
12-Depositions				
Fees: Slip Value	4343.40	16.36%	11.04	16.49%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	4343.40	16.36%	11.04	16.49%
13-Motions				
Fees: Slip Value	5981.55	22.53%	15.13	22.60%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	5981.55	22.53%	15.13	22.60%
15-MSJ				
Fees: Slip Value	1930.35	7.27%	4.81	7.18%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1930.35	7.27%	4.81	7.18%
16-Settlement				
Fees: Slip Value	4081.50	15.37%	10.17	15.19%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	4081.50	15.37%	10.17	15.19%

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DeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
--DCBFB Slip Summary by Activity-Summary Only-No Detail

Page 2

Title	Amount	% Total	Time	% Total
19-Trial and Trial Preparation				
Fees: Slip Value	195.00	0.73%	0.50	0.75%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	195.00	0.73%	0.50	0.75%
23-Mediation				
Fees: Slip Value	1561.53	5.88%	3.93	5.87%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1561.53	5.88%	3.93	5.87%
27-Legal Research Other				
Fees: Slip Value	237.90	0.90%	0.61	0.91%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	237.90	0.90%	0.61	0.91%
29-Misc. Case Efforts				
Fees: Slip Value	791.40	2.98%	1.84	2.75%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	791.40	2.98%	1.84	2.75%
30-Fact Develop (not otherwise)				
Fees: Slip Value	286.13	1.08%	0.66	0.99%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	286.13	1.08%	0.66	0.99%
32-OOJ Activity				
Fees: Slip Value	233.33	0.88%	0.58	0.87%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	233.33	0.88%	0.58	0.87%
Grand Total				
Fees: Slip Value	26553.50	100.00%	66.96	100.00%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	26553.50	100.00%	66.96	100.00%

ATTACHMENT E

3/21/2023
5:16 PMDeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
--DCBFB Fee App Billing by Category with Detail

Page 1

Selection Criteria				
Slip.Slip Type	Time			
Slip.Billing Status	Billable			
Clie.Selection	Include: Harrison, Talia			
Slip ID		Timekeeper	Hrs / Rate	Rate Type
Date		Activity	Qty / Price	Slip Value
Status		Client		
Description (first line)		Reference		
<u>Activity: 01-Intake</u>				
	TIME	C.R. Bridgers	0.34 / \$435.00	Hourly
8/3/2021		Intake		\$149.35
Billable		Harrison, Talia		
Follow up with Melinda Arbuckl re complaint. Finalize Same.				
Total: Charles R. Bridgers				
		BillableHrs	0.34	Billed Total \$149.35
		NotBilledHrs	0.00	
	TIME	M. Herrington	1.20 / \$390.00	Hourly
7/27/2021		Intake		\$468.00
Billable		Harrison, Talia		
Harrison, Talia: call wth client re: documents; review client documents				
	TIME	M. Herrington	0.31 / \$390.00	Hourly
8/3/2021		Intake		\$120.90
Billable		Harrison, Talia		
Pass initial research on consents to Arbuckle.				
Total: Matthew Herrington				
		BillableHrs	1.51	Billed Total \$588.90
		NotBilledHrs	0.00	
Total: 01-Intake				
		BillableHrs	1.85	Billed Total \$738.25
		NotBilledHrs	0.00	
<u>Activity: 02-Complaint_COIP_Service</u>				
	TIME	M. Herrington	1.70 / \$390.00	Hourly
7/29/2021		Compl_COIP_Ser		\$663.00
Billable		Harrison, Talia		
Harrison, Talia: call with client re: factual issues for complaint; review Wright complaint and edit for Harrison; discuss venue issues with CRB; research venue issue				

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--DCBFB Fee App Billing by Category with Detail

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
7/29/2021 Billable Harrison, Talia: communication with Texas counsel re local counsel agreement; review local rules in EDTX	TIME M. Herrington Compl_COIP_Ser Harrison, Talia	0.40 / \$390.00	Hourly \$156.00

Total: Matthew Herrington

BillableHrs	2.10	Billed Total	\$819.00
NotBilledHrs	0.00		

Total: 02-Complaint_COIP_Service

BillableHrs	2.10	Billed Total	\$819.00
NotBilledHrs	0.00		

Activity: 03-Answer_Disclosures_JPR

10/19/2021 Billable Review incoming documents and respond to Reed Smith paralegal for transmission with wrong email address.	TIME C.R. Bridgers Ans_Disc_JPS Harrison, Talia	0.37 / \$435.00	Hourly \$160.95
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Total: Charles R. Bridgers

BillableHrs	0.37	Billed Total	\$160.95
NotBilledHrs	0.00		

8/27/2021 Billable Review answer and corporate disclosure statement; inform client re: content of answer	TIME M. Herrington Ans_Disc_JPS Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
9/15/2021 Billable 26(f) conference; debrief with local counsel re: repleading and settlement issues	TIME M. Herrington Ans_Disc_JPS Harrison, Talia	0.90 / \$390.00	Hourly \$351.00
10/18/2021 Billable Drafting initial disclosures; discuss with local counsel	TIME M. Herrington Ans_Disc_JPS Harrison, Talia	0.40 / \$390.00	Hourly \$156.00

Total: Matthew Herrington

BillableHrs	1.50	Billed Total	\$585.00
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--DCBFB Fee App Billing by Category with Detail

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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NotBilledHrs 0.00

Total: 03-Answer_Disclosures_JPR

BillableHrs	1.87	Billed Total	\$745.95
NotBilledHrs	0.00		

Activity: 04-Amended Complaint/Answer

TIME

9/21/2021
Billable
Call with LC re: collective; call with client re: [redacted]
determine not to pursue collective

M. Herrington	0.60 / \$390.00	Hourly	
AmendedPleading			\$234.00
Harrison, Talia			

Total: Matthew Herrington

BillableHrs	0.60	Billed Total	\$234.00
NotBilledHrs	0.00		

Total: 04-Amended Complaint/Answer

BillableHrs	0.60	Billed Total	\$234.00
NotBilledHrs	0.00		

Activity: 06-Damage Estimate

TIME

11/17/2021
Billable
Review damage estimate with Herrington.

C.R. Bridgers	0.81 / \$435.00	Hourly	
DamageEst			\$352.35
Harrison, Talia			

TIME

12/2/2022
Billable
Work with Maria on expenses and damage estimate.

C.R. Bridgers	0.34 / \$435.00	Hourly	
DamageEst			\$147.90
Harrison, Talia			

Total: Charles R. Bridgers

BillableHrs	1.15	Billed Total	\$500.25
NotBilledHrs	0.00		

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--DCBFB Fee App Billing by Category with Detail

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
11/17/2021 Billable Review time and pay documents; compile damages calculation; call with client re: same; draft demand.	TIME M. Herrington DamageEst Harrison, Talia	2.40 / \$390.00	Hourly \$936.00
11/3/2022 Billable Review deposition for damages issues; all with client re: damages; damages calculations	TIME M. Herrington DamageEst Harrison, Talia	0.50 / \$390.00	Hourly \$195.00
<hr/>			
Total: Matthew Herrington		BillableHrs 2.90 NotBilledHrs 0.00	Billed Total \$1,131.00

Total: 06-Damage Estimate

BillableHrs	4.05	Billed Total	\$1,631.25
NotBilledHrs	0.00		

Activity: 07-Written Discovery

4/12/2022 Billable Discuss discovery issues with Herrington.	TIME C.R. Bridgers Discovery_Wr Harrison, Talia	0.16 / \$435.00	Hourly \$69.60
5/27/2022 Billable Conference with Herrington on outgoing discovery on emails.	TIME C.R. Bridgers Discovery_Wr Harrison, Talia	0.45 / \$435.00	Hourly \$195.75
6/1/2022 Billable Discuss status of email request / MSJ.	TIME C.R. Bridgers Discovery_Wr Harrison, Talia	0.11 / \$435.00	Hourly \$48.58
6/21/2022 Billable Respond to Herrington re Jerra tickets and discovery requests.	TIME C.R. Bridgers Discovery_Wr Harrison, Talia	0.10 / \$435.00	Hourly \$43.50

Total: Charles R. Bridgers

BillableHrs	0.82	Billed Total	\$357.43
NotBilledHrs	0.00		

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--DCBFB Fee App Billing by Category with Detail

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
9/30/2021 Billable Emails to and from Court Reporter re: transcript in previous action to avoid retaking evidence; Emails to and from CRB/MH re: fee; Prepared mailing	J. Sorrenti Discovery_Wr Harrison, Talia	0.25 / \$170.00	Hourly \$42.50
1/14/2022 Billable Discussion with MWH; process evidence documents for transmission; Email to MH	J. Sorrenti Discovery_Wr Harrison, Talia	0.17 / \$170.00	Hourly \$28.33
4/25/2022 Billable Emails to and from CRB; Process and review Defendant's additional document production and saved to file	J. Sorrenti Discovery_Wr Harrison, Talia	0.10 / \$170.00	Hourly \$17.00

Total: Jessica Sorrenti

BillableHrs	0.52	Billed Total	\$87.83
NotBilledHrs	0.00		

1/4/2022 Billable Call with CRB; discuss subpoenas to Constangy and Reed Smith, deposition of McKeeby	M. Herrington Discovery_Wr Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
1/20/2022 Billable Email from OC re: document production; review new client documents; communication with client re: same	M. Herrington Discovery_Wr Harrison, Talia	1.30 / \$390.00	Hourly \$507.00
2/24/2022 Billable Discuss protective order with co-Counsel.	M. Herrington Discovery_Wr Harrison, Talia	0.28 / \$390.00	Hourly \$109.20
8/29/2022 Billable Continue review of documents provided (JIRA); calls with client re: same	M. Herrington Discovery_Wr Harrison, Talia	1.30 / \$390.00	Hourly \$507.00
8/25/2022 Billable Review new production (JIRA); communications with client re: same	M. Herrington Discovery_Wr Harrison, Talia	2.70 / \$390.00	Hourly \$1,053.00

Total: Matthew Herrington

BillableHrs	5.78	Billed Total	\$2,254.20
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Slip ID	Timekeeper	Hrs / Rate	Rate Type
Date	Activity	Qty / Price	Slip Value
Status	Client		
Description (first line)	Reference		

NotBilledHrs 0.00

Total: 07-Written Discovery

BillableHrs	7.12	Billed Total	\$2,699.46
NotBilledHrs	0.00		

Activity: 10-Conferral on Discovery

TIME

4/28/2022

Billable

Review emails from Herrington to local counsel re motion to compel.

C.R. Bridgers	0.10 / \$435.00	Hourly
Conferral_Disco		\$43.50
Harrison, Talia		

Total: Charles R. Bridgers

BillableHrs	0.10	Billed Total	\$43.50
NotBilledHrs	0.00		

Total: 10-Conferral on Discovery

BillableHrs	0.10	Billed Total	\$43.50
NotBilledHrs	0.00		

Activity: 12-Depositions

TIME

1/19/2022

Billable

Conference with Herrington on deposition strategy for client

C.R. Bridgers	0.54 / \$435.00	Hourly
Depositions		\$234.90
Harrison, Talia		

TIME

2/2/2022

Billable

Discuss depositions and MSJ deadline conflict with Herrington; Suggest plan. Respond to Matthew with email question re time limit of deposition and how to handle defendant passing 7 hours.

C.R. Bridgers	0.20 / \$435.00	Hourly
Depositions		\$87.00
Harrison, Talia		

TIME

12/13/2022

Billable

Review emails from MWH with client on depositions and notes to file.

C.R. Bridgers	0.10 / \$435.00	Hourly
Depositions		\$43.50
Harrison, Talia		

Total: Charles R. Bridgers

BillableHrs	0.84	Billed Total	\$365.40
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Slip ID Date Status Description (first line)		Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
		NotBilledHrs	0.00	
1/18/2022 Billable Review client documents; deposition preparation meeting with client	TIME	M. Herrington Depositions Harrison, Talia	2.20 / \$390.00	Hourly \$858.00
1/19/2022 Billable Deposition of client; calls with CRB re: deposition issues; meetings with client	TIME	M. Herrington Depositions Harrison, Talia	8.00 / \$390.00	Hourly \$3,120.00
Total: Matthew Herrington				
		BillableHrs	10.20	Billed Total \$3,978.00
		NotBilledHrs	0.00	
Total: 12-Depositions				
		BillableHrs	11.04	Billed Total \$4,343.40
		NotBilledHrs	0.00	
Activity: 13-Motions				
3/20/2023 Billable Review billing records for fee petition to exercise billing judgment and finalize.	TIME	C.R. Bridgers Motions Harrison, Talia	1.23 / \$435.00	Hourly \$535.05
3/21/2023 Billable Review and finalize Arbuckle declaration; Declaration of CR Bridgers; Generate reports for same. (time estimated through end of day to permit finalization of billing records)	TIME	C.R. Bridgers Motions Harrison, Talia	3.50 / \$435.00	Hourly \$1,522.50
Total: Charles R. Bridgers				
		BillableHrs	4.73	Billed Total \$2,057.55
		NotBilledHrs	0.00	
3/16/2023 Billable Drafted Motion to Extend Time for fee petition and proposed Order; Emails to and from MH; Revised Motion	TIME	J. Sorrenti Motions Harrison, Talia	0.60 / \$170.00	Hourly \$102.00

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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Total: Jessica Sorrenti

BillableHrs	0.60	Billed Total	\$102.00
NotBilledHrs	0.00		

2/13/2023 Billable arrange motion to extend	TIME M. Herrington Motions Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
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3/14/2023 Billable being drafting fee petition; review billing	TIME M. Herrington Motions Harrison, Talia	0.40 / \$390.00	Hourly \$156.00
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3/15/2023 Billable drafting fee petition; review billing related research; review previous texas fee petitions; email with OC; discussion with CRB and co-counsel re: extension due to CRB out of town	TIME M. Herrington Motions Harrison, Talia	2.20 / \$390.00	Hourly \$858.00
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3/15/2023 Billable review motion for extension re: settlement motion; email OC	TIME M. Herrington Motions Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
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3/21/2023 Billable Finalizing fee petition; discussion with CRB; related research (time estimated through end of day to permit finalization of billing records)	TIME M. Herrington Motions Harrison, Talia	3.50 / \$390.00	Hourly \$1,365.00
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3/21/2023 Billable Reply Brief: Conservative Estimate of time required for reply brief. THIS AMOUNT ESTIMATED BEFORE INCURRED.	TIME M. Herrington Motions Harrison, Talia	3.50 / \$390.00	Hourly \$1,365.00
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Total: Matthew Herrington

BillableHrs	9.80	Billed Total	\$3,822.00
NotBilledHrs	0.00		

Total: 13-Motions

BillableHrs	15.13	Billed Total	\$5,981.55
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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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NotBilledHrs 0.00

Activity: 15-MSJ

TIME

3/3/2022
Billable
Call with Matthew re strategy for response and review emails re same.

C.R. Bridgers 0.21 / \$435.00
MSJ
Harrison, Talia

Hourly
\$91.35

TIME

5/22/2022
Billable
Review emails on MSJ status and plans. .

C.R. Bridgers 0.10 / \$435.00
MSJ
Harrison, Talia

Hourly
\$43.50

TIME

9/22/2022
Billable
Multiple calls with Matthew and Melinda re response / surreply to objections and motions.

C.R. Bridgers 0.45 / \$435.00
MSJ
Harrison, Talia

Hourly
\$195.75

TIME

10/6/2022
Billable
Discuss status of motion with Herrington.

C.R. Bridgers 0.10 / \$435.00
MSJ
Harrison, Talia

Hourly
\$43.50

TIME

11/2/2022
Billable
Review MSJ order. Call to Matthew.

C.R. Bridgers 0.35 / \$435.00
MSJ
Harrison, Talia

Hourly
\$152.25

Total: Charles R. Bridgers

BillableHrs 1.21 Billed Total \$526.35
NotBilledHrs 0.00

TIME

9/21/2022
Billable
correspondence with OC; legal research; correspondence with co-counsel

M. Herrington 0.30 / \$390.00
MSJ
Harrison, Talia

Hourly
\$117.00

TIME

9/22/2022
Billable
Review MSJ; correspondence with OC; legal research; correspondence with Co-counsel

M. Herrington 2.50 / \$390.00
MSJ
Harrison, Talia

Hourly
\$975.00

TIME

11/2/2022
Billable
Review MSJ order; call with client to discuss; follow up with CRB and MA

M. Herrington 0.80 / \$390.00
MSJ
Harrison, Talia

Hourly
\$312.00

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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Total: Matthew Herrington

BillableHrs	3.60	Billed Total	\$1,404.00
NotBilledHrs	0.00		

Total: 15-MSJ

BillableHrs	4.81	Billed Total	\$1,930.35
NotBilledHrs	0.00		

Activity: 16-Settlement

11/7/2022 Billable Set up call with Matthew re settlement.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
11/14/2022 Billable Update with Matthew on response to request for settlement; Call with opposing counsel.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.41 / \$435.00	Hourly \$178.35
12/1/2022 Billable Discuss expense issue with MWH and task Maria Arul with review. More conversations re settlement demand.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.43 / \$435.00	Hourly \$187.05
12/14/2022 Billable Prepare for and call with client re settlement.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.61 / \$435.00	Hourly \$265.35
12/24/2022 Billable Draft email to client re authority to make counter proposal.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.41 / \$435.00	Hourly \$178.35
12/24/2022 Billable Review emails re settlement progress from herrington. Notes to file.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
12/30/2022 Billable Review incoming offer from McKeebee, review context and make recommendation to client.	TIME	C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
1/6/2023 Billable Review and respond to emails from MWH re settlement agreement and prevailing party standard.	TIME C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
1/23/2023 Billable Review settlement agreement issues with MWH and Arbuckle.	TIME C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
1/31/2023 Billable Review proposed settlement agreement and respond to Herrington.	TIME C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
2/4/2023 Billable Respond to Matthew after reading Paulo's last email on terms.	TIME C.R. Bridgers Settlement Harrison, Talia	0.10 / \$435.00	Hourly \$43.50

Total: Charles R. Bridgers

BillableHrs	2.56	Billed Total	\$1,113.60
NotBilledHrs	0.00		

11/17/2022 Billable Discuss fee demand with CRB	TIME M. Herrington Settlement Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
12/1/2022 Billable Call with OC to discuss settlement and trial issues	TIME M. Herrington Settlement Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
12/1/2022 Billable Review billing for demand letter; draft demand; discuss with CRB; communication with MA re: her time and fee records	TIME M. Herrington Settlement Harrison, Talia	1.20 / \$390.00	Hourly \$468.00
12/2/2022 Billable Finalize settlement demand, incorporate MA fees; review correspondence with Maria and CRB re: costs	TIME M. Herrington Settlement Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
12/14/2022 Billable Call with client; draft counteroffers	TIME M. Herrington Settlement Harrison, Talia	1.00 / \$390.00	Hourly \$390.00

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
12/27/2022 Billable Draft counteroffer	TIME M. Herrington Settlement Harrison, Talia	0.91 / \$390.00	Hourly \$354.90
12/30/2022 Billable Correspondence with OC.	TIME M. Herrington Settlement Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
1/9/2023 Billable T.call with M Arbuckle re settlement issues.	TIME M. Herrington Settlement Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
1/23/2023 Billable Review settlement agreement; edit same; email correspondence with OC; review previous settlement correspondence for discussion of confidentiality and scope of releases	TIME M. Herrington Settlement Harrison, Talia	0.70 / \$390.00	Hourly \$273.00
1/24/2023 Billable Review settlement motion draft; edit same; review Greene approval motion	TIME M. Herrington Settlement Harrison, Talia	0.70 / \$390.00	Hourly \$273.00
1/27/2023 Billable Email and call with OC re: confidentiality; call with CRB re: same	TIME M. Herrington Settlement Harrison, Talia	0.40 / \$390.00	Hourly \$156.00
2/2/2023 Billable settlement correspondence with OC	TIME M. Herrington Settlement Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
2/3/2023 Billable review settlement correspondence; further settlement communications re: terms for settlement agreement	TIME M. Herrington Settlement Harrison, Talia	0.30 / \$390.00	Hourly \$117.00
2/13/2023 Billable settlement correspondence w/ OC	TIME M. Herrington Settlement Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
2/14/2023 Billable correspondence with OC re: settlement agreement language	TIME M. Herrington Settlement Harrison, Talia	0.20 / \$390.00	Hourly \$78.00

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Slip ID Date Status Description (first line)	TIME	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
2/15/2023 Billable review final edits to agreement; respond to OC		M. Herrington Settlement Harrison, Talia	0.20 / \$390.00	Hourly \$78.00
2/16/2023 Billable communication with OC re: final draft		M. Herrington Settlement Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
2/16/2023 Billable revise settlement motion draft; email OC		M. Herrington Settlement Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
2/24/2023 Billable finalize revisions of settlement motion; email OC		M. Herrington Settlement Harrison, Talia	0.60 / \$390.00	Hourly \$234.00
3/6/2023 Billable Review email from OC		M. Herrington Settlement Harrison, Talia	0.10 / \$390.00	Hourly \$39.00

Total: Matthew Herrington

BillableHrs	7.61	Billed Total	\$2,967.90
NotBilledHrs	0.00		

Total: 16-Settlement

BillableHrs	10.17	Billed Total	\$4,081.50
NotBilledHrs	0.00		

Activity: 19-Trial and Trial Preparation

11/4/2022 Billable Call with MA and CRB; discuss potential trial issues (travel for witnesses, trial depositions, cost shifting); settlement issues discussed	TIME	M. Herrington Trial Harrison, Talia	0.50 / \$390.00	Hourly \$195.00
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Total: Matthew Herrington

BillableHrs	0.50	Billed Total	\$195.00
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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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NotBilledHrs 0.00

Total: 19-Trial and Trial Preparation

BillableHrs	0.50	Billed Total	\$195.00
NotBilledHrs	0.00		

Activity: 23-Mediation

1/4/2022 Billable review mediation particulars.	TIME	C.R. Bridgers Mediation Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
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1/4/2022 Billable Discuss mediation strategy and plans with Herrington.	TIME	C.R. Bridgers Mediation Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
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1/6/2022 Billable Calls from Matthew with status and discussion/approval of negotiation moves.	TIME	C.R. Bridgers Mediation Harrison, Talia	0.33 / \$435.00	Hourly \$144.03
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1/10/2022 Billable Discuss mediator's proposal with Herrington.	TIME	C.R. Bridgers Mediation Harrison, Talia	0.10 / \$435.00	Hourly \$43.50
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Total: Charles R. Bridgers

BillableHrs	0.63	Billed Total	\$274.53
NotBilledHrs	0.00		

1/4/2022 Billable Settlemet correspondence with OC; call with client re: same	TIME	M. Herrington Mediation Harrison, Talia	0.40 / \$390.00	Hourly \$156.00
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1/6/2022 Billable Mediation preparation with client; call wtih CRB re: settlement progress;attend mediation	TIME	M. Herrington Mediation Harrison, Talia	2.90 / \$390.00	Hourly \$1,131.00
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Total: Matthew Herrington

BillableHrs	3.30	Billed Total	\$1,287.00
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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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NotBilledHrs 0.00

Total: 23-Mediation

BillableHrs 3.93 Billed Total \$1,561.53
NotBilledHrs 0.00

Activity: 27-Legal Research Other

TIME

8/27/2021

Billable

Research on necessity of pleading affirmative defenses and standard for more definite statement motion; correspondence with local counsel re: same

M. Herrington 0.61 / \$390.00 Hourly
Research-Legal \$237.90
Harrison, Talia

Total: Matthew Herrington

BillableHrs 0.61 Billed Total \$237.90
NotBilledHrs 0.00

Total: 27-Legal Research Other

BillableHrs 0.61 Billed Total \$237.90
NotBilledHrs 0.00

Activity: 29-Misc. Case Efforts

TIME

7/29/2021

Billable

Harrison_Talea: Work with Herrington on claims, local counsel issues, venue strategy; Research venue and jurisdictional issues, review earlier filings in Wright case.

C.R. Bridgers 1.34 / \$435.00 Hourly
Misc \$582.90
Harrison, Talia

TIME

8/3/2021

Billable

Finalize Pro-Hac Filing.

C.R. Bridgers 0.10 / \$435.00 Hourly
Misc \$43.50
Harrison, Talia

TIME

8/4/2021

Billable

Review incoming docket notice on pro-hac and potential to refer to magistrate.

C.R. Bridgers 0.10 / \$435.00 Hourly
Misc \$43.50
Harrison, Talia

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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
9/29/2021 Billable Review initial filings.	TIME C.R. Bridgers Misc Harrison, Talia	0.10 / \$435.00	Hourly \$43.50

Total: Charles R. Bridgers

BillableHrs	1.64	Billed Total	\$713.40
NotBilledHrs	0.00		

7/22/2022 Billable Emails with MA re case direction.	TIME M. Herrington Misc Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
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9/27/2022 Billable discuss status of case and settlement. with CRB	TIME M. Herrington Misc Harrison, Talia	0.10 / \$390.00	Hourly \$39.00
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Total: Matthew Herrington

BillableHrs	0.20	Billed Total	\$78.00
NotBilledHrs	0.00		

Total: 29-Misc. Case Efforts

BillableHrs	1.84	Billed Total	\$791.40
NotBilledHrs	0.00		

Activity: 30-Fact Develop (not otherwise

6/13/2022 Billable Discuss division of labor and assignmetns with Melinda Arbuckle for witness calls.	TIME C.R. Bridgers Factual Development Harrison, Talia	0.31 / \$435.00	Hourly \$134.85
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6/15/2022 Billable Confirm assignments of tasks to paralegal in Harrison matter.	TIME C.R. Bridgers Factual Development Harrison, Talia	0.35 / \$435.00	Hourly \$151.28
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Total: Charles R. Bridgers

BillableHrs	0.66	Billed Total	\$286.13
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Slip ID Date Status Description (first line)	Timekeeper Activity Client Reference	Hrs / Rate Qty / Price	Rate Type Slip Value
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NotBilledHrs 0.00

Total: 30-Fact Develop (not otherwise

BillableHrs 0.66 Billed Total \$286.13
NotBilledHrs 0.00

Activity: 32-OOJ Activity

TIME

1/12/2022
Billable
Review incoming OOJ; Send back questions to Herrington on
damages and status as well as client notification.

C.R. Bridgers 0.18 / \$435.00 Hourly
OfferJudgement \$77.33
Harrison, Talia

Total: Charles R. Bridgers

BillableHrs 0.18 Billed Total \$77.33
NotBilledHrs 0.00

TIME

12/13/2022
Billable
Call with client re: settlement; review OOJ; review billing

M. Herrington 0.40 / \$390.00 Hourly
OfferJudgement \$156.00
Harrison, Talia

Total: Matthew Herrington

BillableHrs 0.40 Billed Total \$156.00
NotBilledHrs 0.00

Total: 32-OOJ Activity

BillableHrs 0.58 Billed Total \$233.33
NotBilledHrs 0.00

Grand Total

BillableHrs 66.96 Billed Total \$26,553.50
NotBilledHrs 0.00